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6 UNITED STATES DISTRICT COURT

7 DISTRICT OF NEVADA

8 LKIMMY, INC., a Nevada corporation,
9 Plaintiff,

10 vs.

11 BANK OF AMERICA, N.A., a national banking
12 association; IL KIM aka JULIUS KIM, an
individual; DOES I through X; and ROE
13 BUSINESS ENTITIES I through X; inclusive,
14 Defendants.

Case No.: 2:20-cv-02184-RFB-VCF

**STIPULATION AND [PROPOSED]
ORDER TO MODIFY THE BRIEFING
SCHEDULES FOR DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT
AND PLAINTIFF'S MOTION FOR
SUMMARY JUDGMENT**

(Second and Third Request)

15 Plaintiff, LKimmy, Inc. ("LKimmy"), and Defendant, Bank of America, N.A. ("Bana"), by
16 and through their respective counsel of record, hereby stipulate and agree to modify the briefing
17 schedules for Bana's motion for summary judgment [ECF No. 46] filed on September 10, 2021
18 and LKimmy's motion for summary judgment [ECF No. 37] filed on July 28, 2021.

19 Specifically, the parties agree that the deadline for LKimmy to file its response to Bana's
20 motion for summary judgment and reply in support of LKimmy's motion for summary judgment
21 shall be two (2) weeks after the Court issues its ruling on LKimmy's second motion to remand, to
22 be filed on or before October 5, 2021. The parties further stipulate and agree that Bana's reply in
23 support of its motion for summary judgment shall be due two (2) weeks after the filing of
24 LKimmy's response to Bana's motion for summary judgment.

25 The parties respectfully submit the foregoing requested modifications are supported by
26 good cause, as LKimmy will be filing its second motion to remand, which, if granted, would
27 render the parties' competing motions for summary judgment moot.

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1 This stipulation is submitted in compliance with LR IA 6-1. The parties agree that the
2 foregoing proposed extensions are not being requested in bad faith or to delay these proceedings
3 unnecessarily. This is the second stipulation to modify the briefing schedule for Bana's motion for
4 summary judgment [ECF No. 46] and third stipulation to modify the briefing schedule for
5 LKimmy's motion for summary judgment [ECF No. 37].

6 DATED this 28th day of September, 2021.

7
8 HONG & HONG LAW OFFICE

9 /s/ Joseph Y. Hong

10 JOSEPH Y. HONG, ESQ.

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12 1980 Festival Plaza Drive, Suite 650

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Attorney for Plaintiff

LKimmy, Inc.

13 DATED this 28th day of September, 2021.

14
15 WILSON, ELSER, MOSKOWITZ,
16 EDELMAN & DICKER LLP

17 /s/ Chad C. Butterfield

18 CHAD C. BUTTERFIELD, ESQ.

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Attorney for Defendant

Bank of America, N.A.

21 **ORDER**

22 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

23
24 Dated this 29th day of September, 2021.

25
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27 
28 **RICHARD E. BOULWARE, II**
United States District Court